

1 MATTHEW W. HOFFMANN, ESQ.
 2 Nevada Bar No. 9061
 3 TYLER M. CRAWFORD, ESQ.
 4 Nevada Bar No. 10559
 5 ATKINSON WATKINS & HOFFMANN, LLP
 6 d/b/a BATTLE BORN INJURY LAWYERS
 7 10789 W. Twain Ave., Suite 100
 8 Las Vegas, NV 89135
 9 Telephone: 702-562-6000
 10 Facsimile: 702-562-6066
 11 *Attorneys for Plaintiff*

7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**

10 MARTHA DELIA MACIAS SANCHEZ, an
 11 individual, CESAR IVAN MARQUEZ, an
 12 individual;

CASE NO.: 2:24-cv-02086-APG-EJY

13 v.
 14 Plaintiffs,

STIPULATION AND PROPOSED ORDER
TO EXTEND DISCOVERY (First Request)

15 FASHION SHOW MALL, LLC, a foreign
 16 corporation; SCHINDLER ELEVATOR
 17 CORPORATION, a foreign corporation;
 18 MACY'S RETAIL HOLDINGS, LLC, d/b/a
 19 MACY'S INC. and DOES I through X,
 inclusive; and ROE CORPORATIONS I
 through V, inclusive;

Defendants.

20 Pursuant to Federal Rule of Civil Procedure 29(b) and Local Rules IA 6-1, 7-1 and 26-3,
 21 the parties hereby submit the following Stipulation and Order to Extend Discovery Deadlines (First
 22 Request) to extend discovery deadlines and all related case management deadlines by sixty (60)
 23 days.

24 **I. Discovery Completed to Date.**

25 1. Plaintiffs Initial Disclosure of Witnesses and Documents, served on January 21, 2025
 26 2. Defendant Schindler Elevator Corporation's Initial Disclosure of Witnesses and
 27 Documents, served on January 2, 2025
 28 3. Defendant Macy's Retail Holdings, LLC and Fashion Show Mall, LLC Initial

Disclosure of Witnesses and Documents, served on January 30, 2025

4. Plaintiff's written discovery to Defendant Macy's Retail Holding was served on February 5, 2025.

5. Schindler served written discovery Plaintiffs on February 28, 2025.

II. Discovery Left to be Completed.

1. Deposition of Plaintiffs.
2. Deposition of Defendant's 30(b)(6) Representative.
3. Deposition of percipient witnesses.
4. Disclosure of expert witnesses.
5. Deposition of Expert Witnesses.

III. Reasons for Requested Extension.

The parties request additional time to conduct discovery because of the complexity of the parties involved in this matter, as well as the complexity of Plaintiffs medical records. Throughout the current discovery period the parties have been working to investigate this incident in order to streamline this case and dismiss unnecessary parties. Defendant Schindler on January 28, 2025 as well as Defendant Fashion Show on February 24, 2025, proffered declarations to Plaintiffs regarding their relationships with Defendant Macy's and maintenance of the subject escalator, allowing Plaintiffs to better evaluate the scope of the subject Defendants' involvement. Defendant Macy's also provided a declaration to Plaintiffs on February 6, 2025 It is anticipated that Plaintiff will dismiss Defendant Fashion Show as a party without prejudice in this matter. The parties anticipate that multiple experts will be necessary in this matter including medical experts, as well as technical escalator experts.

Both of the Plaintiffs in this matter are continuing medical treatment; the parties are still obtaining medical records and anticipate that independent medical exams may be necessary for both Plaintiffs. Given the complexity of this matter the parties request an additional 60 days.

1 **IV. Current Deadlines and Requested Extension**

	Current Deadline	Proposed Deadline
Amending Pleadings and Adding Parties	April 1, 2025	June 2, 2025
Initial Expert Disclosures	Plaintiff April 1, 2025	Plaintiff June 2, 2025
	Defendant May 1, 2025	Defendant June 30, 2025
Rebuttal Expert Disclosures	All parties, June 2, 2025	All parties, August 1, 2025
Discovery Closes	June 30, 2025	August 29, 2025
Dispositive Motions	July 30, 2025	September 29, 2025
Pre-Trial Order, if no Dispositive Motions	July 30, 2025	September 29, 2025

10 DATED this 28th day of February 2025

11 **ATKINSON WATKINS & HOFFMANN, LLP**

12 /s/ Tyler M. Crawford, Esq.
13 TYLER M. CRAWFORD, ESQ.
14 Nevada Bar No. 10559
15 10789 W. Twain Ave., Suite 100
16 Las Vegas, NV 89135
17 *Attorneys for Plaintiffs*

18 **RESNICK & LOUIS, P.C.**

19 **EVANS FEARS SCHUTTERT**
20 **MCNULTY MICKUS**

21 /s/ Mark R. Smith, Esq.
22 Mark R. Smith, Esq.
23 Nevada Bar. No. 11872
24 8945 W. Russell Road, Suite 330
25 Las Vegas, NV 89148
26 *Attorneys for Defendants*
27 *Fashion Show Mall, LLC and Macy's Retail*
28 *Holdings, LLC*

29 /s/ Skylar Arakawa-Pamphilon, Esq.
30 Jay J. Schuttert, Esq. (SBN 8656)
31 Skylar Arakawa-Pamphilon, Esq. (SBN
32 15864)
33 Brennen D Marshall, Esq. (SBN 16578)
34 6720 Via Austi Parkway, Suite 300
35 Las Vegas, NV 89119
36 *Attorneys for Defendant*
37 *Schindler Elevator Corporation*

38 **IT IS SO ORDERED:**

39 
40 **UNITED STATES MAGISTRATE JUDGE**

41 **DATED:** February 28, 2025